

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

EDWARD J. BRONSON,

CASE NO. 16-23498 (RDD)

Debtor.

APPLICATION FOR ORDER FOR EXAMINATION OF NON-DEBTOR
WITNESS PURSUANT TO BANKRUPTCY RULE 2004

Mark S. Tulis, by his attorneys Tulis, Wilkes, Huff & Geiger, LLP, respectfully shows and alleges:

1. Edward J. Bronson (the “Debtor”) is the debtor herein having filed a voluntary petition for relief under Chapter 7 of the United States Bankruptcy Code on October 31, 2016.
2. Mark S. Tulis (the “Trustee”) was appointed Trustee pursuant to 11 U.S.C. §701 and 702(d).
3. The Debtor is a financial securities trader actively trading on the public markets and he earned substantial income in years past. In 2012, the Debtor was charged by the Securities and Exchange Commission with having conducted illegal trades and substantial funds were sought from him in recoupment. In particular, the SEC charged that the Debtor purchased penny stocks from the issuers for substantial discounts and then promptly sold them on the public markets without the required disclosure reporting and filings.
4. Thereafter, the Debtor suffered a substantial judgment from an investor seeking return of funds invested with him.
5. The Trustee conducted an examination of the Debtor at a meeting of the creditors held

pursuant to §341 of the Bankruptcy Code. The SEC and certain other creditors made document production demands upon the Debtor pursuant to Bankruptcy Rule 2004 in furtherance of their efforts for discovery of information.

6. One major concern and area of inquiry concerns the tracing of the proceeds of the lucrative transactions the Debtor conducted prior to being halted by the SEC's enforcement action. The accounts that the Debtor maintained appear thus far to be exhausted.

7. The Trustee wishes to pursue his investigation by examining the spouse of the Debtor, Dawn Bronson (the proposed "Witness"). The Witness is also a professional in the financial industry. She recently opened a new entity for the purpose of conducting business which is called "V2IP, Inc." The entity was registered in the State of New York on February 17, 2017 as a foreign business corporation. It is believed to have been originally organized under Delaware law.

8. The Trustee is concerned that assets belonging to the Debtor, assets that should be property of the estate, and/or proceeds of the Debtor's illegal trades, have been transferred to the Witness and are being managed and maintained by her. Accordingly, the Trustee seeks an order directing the Witness to produce documents and submit to examination concerning the business transactions she has conducted in the last six years to determine whether assets of the Debtor are in existence.

9. Pursuant to Bankruptcy Rule 2004, a party in interest may examine any person or entity as to the acts, conduct, or property or to the liabilities and financial condition of the debtor, or as to any matter which may affect the administration of the debtor's estate. It is clear that these matters concern the property of the estate, and that they are necessary and appropriate for

inquiry.

10. Accordingly, Applicant respectfully requests an order pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure directing the Witness to appear for an examination and to produce the following:

A. All documents concerning V2IP, Inc. including, but not limited to,

a) All documents concerning organizational acts including articles of incorporation, shareholder agreement, stock registry;

b) All documents concerning applications for bank credit;

c) All documents concerning bank accounts maintained by V2IP, Inc. including bank statements for the six (6) year period preceding this request, including deposit records and disbursement vouchers and cancelled checks;

d) All documents concerning contracts and business agreements to which V2IP, Inc. is or was a party during the six (6) years preceding this request; and

e) All books of account including profit and loss statements, income statements, balance sheets, records of transactions, accounts receivable and payable, and tax returns covering the company's fiscal years ending in 2012 through 2017.

B. All documents concerning the financial affairs of Dawn Bronson, including but not limited to:

a) All bank statements for bank accounts maintained solely by Dawn Bronson, or maintained jointly with another person(s) for the six (6) year period preceding this request.

b) All brokerage statements for accounts maintained in the name of Dawn Bronson or maintained jointly with another person(s) for the six (6) year period preceding this

request.

WHEREFORE, Applicant respectfully requests entry of the annexed proposed order pursuant to Bankruptcy Rule 2004 directing the Witness to appear for an examination and to produce the documents specified and for such other and further relief as is just.

Dated: Tarrytown, N.Y.
April 7, 2017

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